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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

John Waudby,

Plaintiff,

v.

Trans Union, LLC et al,

Defendant.

Case No.: 2:22-cv-01889-RFB-DJA

**Motion for an extension of time for
Defendant Trans Union, LLC
Information Solutions, Inc. to
respond to Plaintiff's complaint**

John Waudby ("Plaintiff"), by and through counsel, hereby requests an extension of time for Defendant Trans Union, LLC ("Defendant") to respond to Plaintiff's complaint. Defendant's responsive pleading is currently due on January 9, 2022. This is the first request for an extension of this deadline.

The extension is sought because the parties are engaged in active settlement discussions that may alleviate Defendant's need to retain counsel and appear in this case.

1 In good faith and not for the purposes of delay, Plaintiff submits this
2 motion, on behalf of Defendant, and requests that this Court extend Defendant's
3 deadline to file its responsive pleading until on or before **February 8, 2022**.

4 Dated: .

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6 **FREEDOM LAW FIRM , LLC**

7 /s/ Gerardo Avalos
8 George Haines, Esq.
9 Gerardo Avalos, Esq.
10 8985 South Eastern Ave., Suite 350
11 Las Vegas NV 89123
12 *Attorneys for Plaintiff John Waudby*

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14 IT IS SO ORDERED:

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16 _____
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: January 9, 2023
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